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7 *Attorney for Defendant*

8 THE UNITED STATES DISTRICT COURT  
9 FOR THE DISTRICT OF OREGON  
10 PORTLAND DIVISION

11 M.W., by and through M.W.'s father and next  
12 friend, R.W.,

13 Plaintiff,

14 v.

15 Providence Health Plan, Inc.,

16 Defendant.

NO. 3:21-CV-00213

UNOPPOSED MOTION TO EXTEND  
DEADLINE TO RESPOND TO  
COMPLAINT

NOTE FOR HEARING:  
Monday, April 26, 2021

17 Defendant Providence Health Plan ("PHP"), through its counsel, respectfully requests the  
18 time for the response to Plaintiffs' Complaint be extended to May 3, 2021. Defendant has not  
19 previously sought any extensions. This motion is for good cause and not for the purpose of delay.  
20 Plaintiff's counsel has been advised and does not oppose the instant motion.

21 Accordingly, Defendant respectfully requests the deadline for response to Plaintiff's  
22 Complaint be extended to May 3, 2021. By submitting this motion Defendant does not waive any  
23 defenses.

24 UNOPPOSED MOTION TO EXTEND  
25 DEADLINE TO RESPOND TO  
26 COMPLAINT- 1

#5005293 v1 / 42700-053

KARR TUTTLE CAMPBELL  
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1 DATED at this 26th day of April 2021.

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5 s/Medora A. Marisseau  
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CERTIFICATE OF SERVICE

I, Jan Likit, affirm and state that I am employed by Karr Tuttle Campbell in King County, in the State of Washington. I am over the age of 18 and not a party to the within action. My business address is: 701 Fifth Avenue, Suite 3300, Seattle, Washington 98104. On this day, I caused the foregoing to be served on the parties listed below in the manner indicated.

Megan E. Glor, OSB #930178  
megan@meganglor.com  
Attorney for Plaintiff

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Via U.S. Mail  
Via Hand Delivery  
Via Electronic Mail  
Via Overnight Mail  
CM/ECF via court's website

Jane Paulson, OSB #911804  
jane@paulsoncoletti.com  
Attorney for Plaintiff

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Via U.S. Mail  
Via Hand Delivery  
Via Electronic Mail  
Via Overnight Mail  
CM/ECF via court's website

I declare under penalty of perjury that the foregoing is true and correct.

Dated on this 26th day of April 2021, at Seattle, Washington.

s/Jan Likit

Jan Likit

Legal Assistant to Medora Marisseau